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27 United Healthcare Services, Inc., UnitedHealthcare  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ALMONT AMBULATORY SURGERY  
CENTER, LLC, a California limited  
liability company, et al.,  
Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.; et al.,  
Defendants.

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UNITED HEALTHCARE SERVICES,  
INC.; et al.,  
Counterclaim Plaintiffs

v.

ALMONT AMBULATORY SURGERY  
CENTER, LLC, a California limited  
liability company; et al.,  
Counterclaim Defendants.

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Case No. 2:14-CV-03053-MWF (VBKx)

**JOINT STIPULATION TO ENTRY  
OF ELECTRONICALLY STORED  
INFORMATION (ESI)  
DISCOVERY PLAN**

Judge: Hon. Michael W. Fitzgerald

Magistrate Judge: Hon. Victor B. Kenton

Trial Date: None Set  
Complaint Filed: March 21, 2014

The parties to the above-captioned litigation (the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Parties have entered into a stipulation regarding Electronically Stored Information ("ESI");

WHEREAS, the Parties submit herewith a Proposed ESI Discovery Plan;

NOW, THEREFORE, the Parties agree that the Proposed ESI Discovery Plan be filed and entered in the above-captioned litigation.

IT IS SO STIPULATED.

1 Dated: November 20, 2014

WALRAVEN & WESTERFELD LLP

2  
3 By: /s/ Bryan S. Westerfeld

4 BRYAN S. WESTERFELD

5 Attorneys for Defendant UnitedHealth  
6 Group, Inc., and Defendants/Counterclaim  
7 Plaintiffs United Healthcare Services, Inc.,  
8 UnitedHealthcare Insurance Company, and  
9 OptumInsight, Inc.

10 Dated: November 20, 2014

DORSEY & WHITNEY LLP

11 By: /s/ R. J. Zayed

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13 Attorneys for Defendant UnitedHealth  
14 Group, Inc., and Defendants/Counterclaim  
15 Plaintiffs United Healthcare Services, Inc.,  
16 UnitedHealthcare Insurance Company, and  
17 OptumInsight, Inc.

18 Dated: November 20, 2014

HOOPER, LUNDY & BOOKMAN, P.C.

19 By: /s/ Eric M. Chan

20 ERIC M. CHAN

21 Attorneys for Plaintiffs and Counterclaim  
22 Defendants

23 Dated: November 20, 2014

SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP

24 By: /s/ Barbara Taylor

25 BARBARA TAYLOR

26 Attorneys for Counterclaim Defendants  
27 Michael Omid, M.D. and Julian Omid  
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